

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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David E. Patton  
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January 18, 2022

**VIA ECF**

Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
40 Centre Street  
New York, NY 10007

**MEMO ENDORSED**

**Re: United States v. Harry Rodriguez  
21 Cr. 588 (KPF)**

Dear Judge Failla,

I write to respectfully request that the Court adjourn the conference currently scheduled for Thursday, January 20, 2022, for approximately sixty days. The Government, by Assistant United States Attorney Rebecca Dell, consents to this application.

The parties have engaged in extensive plea negotiations, but are not prepared to reach a disposition at this time. As such, undersigned counsel requested discovery from the government and now needs the requested adjournment to receive and review the evidence.

Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act until the newly selected date.

Thank you for your consideration.

Respectfully submitted,

/s/

Sylvie Levine  
Attorney for Mr. Rodriguez  
212-417-8729

Application GRANTED.

The conference in this matter is hereby ADJOURNED to **March 23, 2022, at 12:00 p.m.**

Additionally, time is excluded between January 21, 2022, and March 23, 2022. The Court finds that the ends of justice served by excluding such time outweigh the interests of the public and Mr. Rodriguez in a speedy trial because it will permit Mr. Rodriguez and his counsel to review discovery and determine the appropriate next steps in this case.

The Clerk of Court is directed to terminate the motion at docket entry 17.

Dated: January 19, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE